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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

Luz Jordell,

Plaintiff,

vs.

Innovis Data Solutions, Inc.; and  
Verizon Wireless Services LLC,

Defendants.

CASE NO.: 2:22-cv-00167-JAD-DJA

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER COMPLAINT**

Plaintiff Luz Jordell ("Plaintiff") hereby files this Unopposed Motion for Extension of Time for Verizon Wireless Services LLC ("Defendant") to Answer Complaint, and in support states:

1. Defendant's responsive pleading is due on February 21, 2021.
2. Plaintiff and Defendant are actively engaged in case-resolution negotiations.
3. Plaintiff does not oppose an extension of Defendant's time to answer the Complaint so that the parties may devote their energies to resolving this matter. Plaintiff files this Motion consistent with an agreement with Defendant and further files this motion respectfully

requesting the Court for an extension of time for Defendant to file its responsive pleading for 14 days, to **March 7, 2022**.

4. The motion is filed in good faith and not for delay.
5. This is the first request for an extension of time for Defendant to answer complaint and the requested extension does not prejudice the parties.
6. For the foregoing reasons, Plaintiff requests that the Court issue an order extending the date, to **March 7, 2022**, on which Defendant must answer or otherwise respond to Plaintiff's Complaint.

**Dated:** February 18, 2021.

	<p>FREEDOM LAW FIRM</p> <p>By: <u>/s/ Gerardo Avalos</u>  George Haines, Esq.  Nevada Bar No. 9411  Gerardo Avalos, Esq.  Nevada Bar No. 15171  8985 S. Eastern Ave, Suite 350  Las Vegas, Nevada 89123  (702) 880-5554  (702) 385-5518 (fax)  Ghaines@freedomlegalteam.com  Gavalos@freedomlegalteam.com  Counsel for Plaintiff Evelyn Jones</p>
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IT IS SO ORDERED.



United States Magistrate Judge

DATED: February 22, 2022